

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	
BRIAN TODD and)	CR. NO. 04-10246-PBS
SHAUN TODD)	

JOINT MOTION TO CONTINUE TRIAL

The United States of America, by and through its attorneys United States Attorney Michael J. Sullivan and Assistant United States Attorney Donald L. Cabell, and the defendants Brian and Shaun Todd, respectfully move that the Court continue the trial in this matter, presently scheduled for September 12, 2005, to September 26, 2005. In support of the motion, the undersigned AUSA is presently dealing with an ongoing, serious family medical issue which will require him to spend time away from the office at various times during the week of September 22nd, such that conducting the trial during that period would present a hardship. In addition, counsel for the defendants inadvertently failed to realize that the September 22nd trial date would conflict with counsel's non-refundable travel plans to be out of the state from September 15, 2005 through September 23, 2005. The parties are aware of, and apologize for, the inconvenience to the Court should the continuance be granted, but respectfully submit that the request is made in good faith and not for the sake of delay.

BRIAN and SHAUN TODD
By His Attorney

MICHAEL J. SULLIVAN
United States Attorney

By:

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